

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
SHREVEPORT DIVISION

MAGNOLIA ISLAND PLANTATION, L.L.C.	§	CIVIL ACTION NO: 5:18-cv-01526
and BARBARA MARIE CAREY LOLLAR	§	
	§	
Plaintiffs	§	
	§	
VS.	§	DISTRICT JUDGE ELIZABETH FOOTE
	§	
LUCKY FAMILY, L.L.C., W.A. LUCKY, III,	§	
And BOSSIER PARISH SHERIFF JULIAN	§	
C. WHITTINGTON, in his official capacity	§	
	§	MAGISTRATE JUDGE KAREN HAYES
Defendants	§	

**CONSENT MOTION TO EXTEND DEADLINE**

NOW INTO COURT, through undersigned counsel, comes JULIAN C. WHITTINGTON, Sheriff of Bossier Parish (hereinafter "Sheriff"), who respectfully submits:

1.

Sheriff filed a Motion for Summary Judgment on December 23, 2019 (Doc. 79) (hereinafter the "Sheriff MSJ") and an Amended and Corrected Motion for Summary Judgment on January 7, 2020 that corrected typographical errors in the Sheriff MSJ only (Doc. 96).

2.

The deadline to file an opposition to the Sheriff MSJ was originally set for January 6, 2020 with the reply deadline set as January 13, 2020, per the Notice of Motion Setting dated December 23, 2019 (Doc. 81). However, by consent of the parties the deadline for opposition was extended to January 20, 2020 and replies were extended to January 27, 2020 (Doc. 91). Because January 20, 2020 was a holiday, Plaintiffs'

Opposition to the Sheriff MSJ was not filed until January 21, 2020 leaving only six days for the Sheriff to prepare a response.

3.

Sheriff shows that Plaintiffs' Memorandum in Opposition to the Sheriff MSJ is lengthy (Doc. 103), thirteen pages longer than the Sheriff MSJ that it opposes. As such Sheriff needs more than the typical seven days to review and prepare a reply. Sheriff further shows that Plaintiffs were given almost a month to prepare their opposition, and requests that they be afforded the same consideration and allowed additional time to respond to the Opposition.

4.

Sheriff desires an extension to February 7, 2020 to file a response to Plaintiffs' opposition.

5.

Undersigned counsel shows that she has conferred with opposing counsel and that the parties have agreed to extend the deadline for Sheriff to respond to the Opposition to the Sheriff MSJ (Doc. 103) to February 7, 2020. Plaintiffs' counsel asked that their deadline to respond to Sheriff's Opposition to Plaintiffs' Motion for Summary Judgment (Doc. 104) also be extended to February 7, 2020, and Sheriff does not oppose such an extension.

6.

The trial of this matter is presently set for April 13, 2020.

WHEREFORE, Julian Whittington, in his capacity as Sheriff of Bossier Parish, PRAYS that this Motion to Extend Deadline be granted, allowing Sheriff until

February 7, 2020 to file a response to Plaintiffs' Opposition (Doc. 103) to Sheriff's Motion for Summary Judgment, as amended and corrected (Doc. 96).

APPEARER FURTHER PRAYS that Plaintiffs be granted until February 7, 2020 to file a Reply to Sheriff's Opposition to Plaintiffs' Motion for Summary Judgment (Doc. 104).

Respectfully submitted by:

LANGLEY & PARKS, LLC

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***Attorney for Julian C. Whittington,  
Sheriff of Bossier Parish***